

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**IN RE: Kim D. Brew**

**Debtor(s)**

**Lakeview Loan Servicing, LLC**

**Movant**

**vs.**

**Kim D. Brew**

**Debtor(s)**

**Scott F. Waterman**

**Trustee**

**BK NO. 17-18335 AMC**

**Chapter 13**

**LAKEVIEW LOAN SERVICING, LLC'S NOTICE OF DEBTOR'S  
REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor Lakeview Loan Servicing, LLC ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 6 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 08/01/2022 through 01/01/2023. Creditor holds a secured interest in real property commonly known as 4833 Pulaski Avenue Philadelphia, PA 19144 as evidenced by claim number 6 on the Court's claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 02/01/2023 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Respectfully Submitted,

/s/Rebecca A. Solarz, Esquire  
Rebecca A. Solarz, Esquire  
*Attorney for Creditor*